REMARKS

Applicant appreciates the Office's review of the present application. In response to the Office Action, the cited references have been reviewed, and the rejections and objections made to the claims by the Examiner have been considered. The claims presently on file in the present application are believed to be patentably distinguishable over the cited references, and therefore allowance of these claims is earnestly solicited.

In order to render the claims more clear and definite, and to emphasize the patentable novelty thereof, claims 1-3, 6-10, 13-16, 18-21, 23, 25-26, and 30-31 have been amended, claims 27-29 have been cancelled without prejudice, and new claims 32-33 have been added. Support for any new claims is found in the specification, claims, and drawings as originally filed, and no new matter has been added. Accordingly, all claims presently on file in the subject application are in condition for immediate allowance, and such action is respectfully requested.

Rejections

Rejection Under 35USC § 112 Second Paragraph

Claims 1-3, 11, 15-26, and 30-31 have been rejected under 35 USC § 112, subparagraph 2, as being indefinite for failing to particularly point and distinctly claim the subject matter which the Applicant regards as the invention. In response, each of the Examiner's stated reasons have been addressed in the foregoing claim amendments and are briefly summarized below.

Claims 1-3, 15-16, 20, and 30-31 have been amended to more clearly recite that workflow is in accordance with the one or more user-desired product properties so as to achieve the user-desired product.

Claim 26 has been amended to more clearly recite that the transformed user request is configured to produce a user-desired product in accordance with the one or more user-desired

product properties.

The Office's attention is respectfully drawn to Applicants' specification at paragraphs [0014]-[0015], which provides support for the above amendments.

As to claim 11, Applicant believes that the claim is not indefinite in light of the specification at paragraphs [0014]-[0015].

In view of the foregoing, it is submitted that the rejections under 35 USC § 112, paragraph 2, have been overcome and should be withdrawn.

Rejection Under 35USC § 102

Claims 1-5, 10, 12, 15, 17, 20, 22-24, 26, and 30-31 have been rejected under 35 USC § 102(e), as being anticipated by U.S. patent application publication 2002/0184240 to Volkoff et al. ("Volkoff"). Applicants respectfully traverse the rejection and request reconsideration based on the amendment to claims 1-3, 10, 15, 20, 23, 26, and 30-31 and features in the other claims which are neither disclosed nor suggested in the cited reference.

As to a rejection under 102, "[a]nticipation is established only when a single prior art reference discloses expressly or under the principles of inherence, each and every element of the claimed invention." *RCA Corp. v. Applied Digital Data Systems, Inc., (1984, CAFC) 221 U.S.P.Q. 385.* The standard for lack of novelty, that is for "anticipation," is one of strict identity. To anticipate a claim, a patent or a single prior art reference must contain all of the essential elements of the particular claims. *Schroeder v. Owens-Corning Fiberglass Corp., 514 F.2d 901, 185 U.S.P.Q. 723 (9th Cir. 1975); and Cool-Fin Elecs. Corp. v. International Elec. Research Corp., 491 F.2d 660, 180 U.S.P.Q. 481 (9th Cir. 1974).* The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).* The elements must be arranged as required by the claim. *In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).*

Independent claim 1 (amended), and its dependent claims 2-5, are patentably

distinguishable over the cited reference because claim 1 emphasizes the novel features of the present invention in which a user request is processed by a workflow management device using predefined rules data so as to produce a transformed user request, prior to communicating with the one or more workflow processing devices that produce a user-desired product. In this regard, claim 1 recites:

"1. (Currently amended) A workflow management device comprising:
a communications interface configured to receive a user request comprising one or more user-desired product properties associated with a user-desired product, the interface further configured to communicate with one or more workflow processing devices located external of the workflow management device;
a storage device configured to store predefined rules data for processing the user request; and
processing circuitry configured to process the user request using the predefined rules data to produce a transformed user request without communicating with the one or more workflow processing devices, the transformed user request including information for automatically organizing workflow among the one or more workflow processing devices in accordance with the one or more user-desired product properties so as to achieve the user-desired product." (emphasis added)

The Volkoff reference discloses "a job ticket service that allows access and modification of a job ticket by multiple users on a network" (para. [0005]). The job ticket is created by a user at a terminal (para. [0003]), and may include a data file and a content file (para. [0023]). Workflow processors 80 (Figs. 3,4) can access the job ticket, including branches thereof (para. [0039]). "Some job tickets 61 may be accessed by multiple processors 80, in ... serial ... fashion. ... [A] first processor may acquire the job ticket 61 (or a portion or branch thereof), and perform a process specified in the work flow, which may modify the branch. Such modification may be to indicate a branch as complete, use up input resources, or create new output resources, for example" (para. [0040]; emphasis added).

Significantly, it can be seen that the transformed user request of the Volkoff reference (i.e. the job ticket as ultimately modified) is produced in conjunction with communicating with the one or more workflow processing devices, not without communicating with the one or more workflow processing devices as recited in claim 1. As described above, the workflow processing

devices of the Volkoff reference participate in the transformation of the user request by modifying the job ticket. With regard to the operation 100 of the job ticket service 60, the Volkoff reference further teaches:

"With completion of each node in the node tree 10, <u>the processor 80 may provide an input to the job ticket service 60 to allow modification of the job ticket 61, block 135</u>. If the processor 80 completes all required processes, the processor 80 may provide a final status report to the job ticket service 60, block 140, along with <u>any final modifications to the job ticket 61</u>" (para. [0117]; Fig. 9; emphasis added).

The novel features of the present invention are not anticipated by the Volkoff reference in that the essential element of producing a transformed user request <u>without communicating with the one or more workflow processing devices</u> is absent from the Volkoff reference. Therefore, the rejection is improper at least for that reason and should be withdrawn.

Independent claims 15, 20, 30, and 31 have each been amended to recite limitations similar to those of claim 1, discussed above. For similar reasons as explained heretofore with regard to claim 1, the novel features of the present invention are not anticipated by the Volkoff reference. Therefore, the rejection of these independent claims, and their corresponding dependent claims 17, 22-24, and 26, is improper at least for these reasons and should be withdrawn.

Independent claim 10 (amended), and its dependent claim 12, are patentably distinguishable over the cited reference because claim 10 emphasizes the novel features of the present invention in which a workflow processing device includes a prestored stylesheet that have rules for processing a user request received from external to the device. In this regard, claim 10 recites:

"10. (Currently amended) A workflow processing device comprising:
a <u>stylesheet prestored in the device</u>, the stylesheet <u>having predefined rules for processing a user request received from external to the workflow processing device</u>; and
processing circuitry configured to receive the user request, load the predefined rules, and execute the predefined rules to create a transformed request, and

wherein the transformed request comprises instructions to automatically organize workflow to efficiently process the user request."

With regard to a stylesheet, and in light of the Office's interpretation of the stylesheet as a list of page layout or format specifications, the Volkoff reference discloses:

"FIG. 2 is a node-tree diagram (or simply a node tree) 10 that illustrates <u>processes defined in a job ticket</u> for printing a brochure. The brochure may be printed on a commercial press, and may use digital content to generate plates for printing the brochure. Within the node tree 10, the nodes specify a product, process, or group of processes. Each node may modify, consume or create resources." (para. [0028]; emphasis added)

In the Volkoff reference, the job ticket is <u>part of the job request</u> (i.e. user request) that is received by the service center 40 (para. [0023]), or may be <u>created by the service center 40 using information in the job request</u> (para. [0032]). For example, "[t]he work flow controller 70 may also be used to designate the various nodes, input and output resources, and other features of the node tree used to complete the job request. That is, the work flow controller 70 may be used to create a construct, or work flow, such as the node tree 10 shown in FIG. 2" (para. [0048]).

Conversely, as recited in claim 10, the stylesheet is <u>not part of the user request or created by the workflow processing device</u>, but rather is <u>prestored in the workflow processing device</u>.

In addition, the Volkoff reference does not disclose <u>predefined</u> rules for processing the user request in the stylesheet. In the Volkoff reference, the nodes, input and output resources of the node tree 10 of the Volkoff reference are <u>created or designated</u> by the work flow controller 70 or another component of the service center 40 <u>during processing</u> of the user request.

The novel features of the present invention are not anticipated by the Volkoff reference in that the essential element of a stylesheet prestored in the workflow processing device, the stylesheet having predefined rules for processing a user request received from external to the workflow processing device, is absent from the Volkoff reference. Therefore, the rejection is improper at least for that reason and should be withdrawn.

Independent claims 20, 30, and 31 have each been amended to recite limitations similar to those of claim 10, discussed above. For similar reasons as explained heretofore with regard to

claim 10, the novel features of the present invention are not anticipated by the Volkoff reference. Therefore, the rejection of these independent claims, and their corresponding dependent claims 22-24, and 26, is also improper at least for these additional reasons and should be withdrawn.

Rejection Under 35USC § 103

Dependent claims 6-9, 11, 13-14, 16, 18-19, 21, 23, and 25 have been rejected under 35 USC § 103(a), as being unpatentable over U.S. patent application publication 2002/0184240 to Volkoff et al. ("Volkoff") in view of U.S. patent 6,507,857 to Yalcinalp ("Yalcinalp").

Applicants respectfully traverse the rejection and request reconsideration based on the dependence of these claims on one of independent claims 1, 10, 15, and 20, whose reasons for allowability over the Volkoff reference have been discussed heretofore and against which the Yalcinalp reference has not been cited.

Applicants further respectfully traverse the rejection and request reconsideration because there is no suggestion or motivation to modify the reference or to combine reference teachings. With regard to motivation, the Office stated that extensible stylesheet language (XSL) provides formatting of source elements based on uniqueness; the creation of formatting constructs including generated text and graphics; an XSL transformation extension that automatically converts XML documents to another language such as HTML.; and an XSL formatting objects extension which allows easier location, sharing, and combination of information. However, Applicant respectfully believes that this listing of features and capabilities of XSL technology does not bear any relation to the disclosure of the Volkoff reference, is not specific as to how one of ordinary skill in the art would have found it obvious to practice the claimed invention, and is insufficient to establish a prima facie case of obviousness. Applicant respectfully believes that suggestion or motivation to combine the Volkoff and Yalcinalp references could be possible only in hindsight and in light of Applicant's own teachings. Therefore, the rejection is believed improper for this additional reason also and should be withdrawn.

Formalities

Claim Objections

The Office objected to claims 9, 14, 19, 23, and 25-26, requiring that the acronyms "XSL" and "XSLT" be spelled out. Applicant has amended these claims, and also claims 7-8, accordingly.
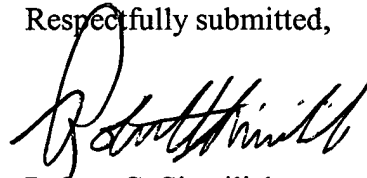
Conclusion

Attorney for Applicant has carefully reviewed each one of the cited references made of record and not relied upon, and believes that the claims presently on file in the subject application patentably distinguish thereover, either taken alone or in combination with one another.

Therefore, all claims presently on file in the subject application are in condition for immediate allowance, and such action is respectfully requested. If it is felt for any reason that direct communication with Applicant's attorney would serve to advance prosecution of this case to finality, the Examiner is invited to call the undersigned Robert C. Sismilich, Esq. at the below-listed telephone number.

AUTHORIZATION TO PAY AND PETITION

FOR THE ACCEPTANCE OF ANY NECESSARY FEES

If any charges or fees must be paid in connection with the foregoing communication (including but not limited to the payment of an extension fee or issue fees), or if any overpayment is to be refunded in connection with the above-identified application, any such charges or fees, or any such overpayment, may be respectively paid out of, or into, the Deposit Account No. 08-2025 of Hewlett-Packard Company. If any such payment also requires Petition or Extension Request, please construe this authorization to pay as the necessary Petition or Request which is required to accompany the payment.

Respectfully submitted,

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